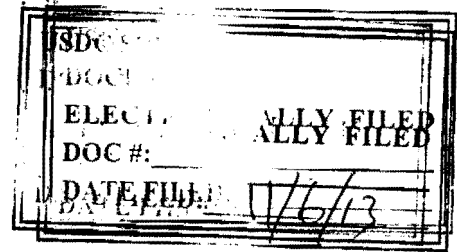


Hellerstein, A.



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION :
----- :

21 MC 102 (AKH)

MIECZYSLAW ZYGMUNT AND ROZA
ZYGMUNT,

Plaintiffs,

09 CV 0679 (AKH)

-against-

59 MAIDEN LANE ASSOCIATES, LLC, ET AL.
Defendants

STIPULATION OF
DISCONTINUE REGARDING
SPECIFIC CLAIMS BY
PLAINTIFF MIECZYSLAW
ZYGMUNT

X

IT IS HEREBY STIPULATED AND AGREED by and between Verizon New York Inc. and plaintiff Mieczyslaw Zygmunt and derivative plaintiff Roza Zygmunt (collectively, Plaintiffs) that Plaintiffs' claims in the above-captioned action, as asserted against all defendants, are discontinued without prejudice to the extent that those claims pertain to, or seek recovery for, any and all cardiology-related, or heart-related, injuries, conditions, or diseases, including but not limited to Coronary Artery Disease.

IT IS FURTHER STIPULATED AND AGREED that if evidence indicating that Plaintiffs' cardiology-related claims are proper is later discovered, then Plaintiffs may reinstitute those claims without regard to, and without any effect on, the applicable Statute of Limitations, assuming that Plaintiffs' cardiology-related claims were timely when first made. Defendants hereby reserve all defenses, including their Statute of Limitations-based defense. In the event that Plaintiffs reinstitute their cardiology-related claims, Defendants will be permitted to take reasonable discovery relating to those claims, including but not limited to additional time to

depose Plaintiffs and the opportunity to have Mr. Zygmunt examined by an appropriate specialist or specialists.

This Stipulation of Discontinuance may be filed with the Clerk of the Court without further notice.

Dated: New York, New York
August 20, 2013

KIRKLAND & ELLIS LLP
Counsel for Verizon New York Inc.
Member of Defense Liaison Committee



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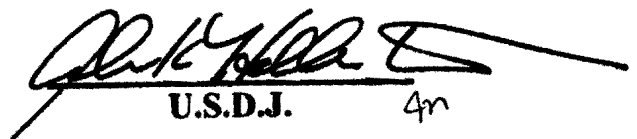
**GREGORY J. CANNATA &
ASSOCIATES, P.C.**
*Counsel for Plaintiffs Mieczyslaw and Roza
Zygmunt*



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SO ORDERED:

11/6/13


U.S.D.J. 4m